UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 16

UNITED PARCEL SERVICE, INC.)
)
Respondent)
)
)
and) Cases 16-CA-028064
) 16-CA-062316
) 16-CA-070588
) 16-CA-081494
) 16-CA-085218
)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS, LOCAL UNION 373,)
)
Charging Party.)

MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF OR RESPONSE TO EXCEPTIONS

Pursuant to Section 102.46 of the National Labor Relations Board Rules and Regulations, the Respondent, United Parcel Service, Inc. ("UPS") requests a 30-day extension of time to file either an answering brief or responses to the Exceptions filed by the General Counsel to the Decision of the Administrative Law Judge Keltner Locke dated August 15, 2013, for the following reasons:

1. The current matter involves 5 separate charges that were filed by Local 373 from August 9, 2011 through July 13, 2012, all of which were Consolidated and involve multiple grievances, hundreds of information requests, and thousands of documents.

- 2. On August 15, 2013, Judge Locke issued a Decision addressing each paragraph in the Consolidated Complaint, and dismissed the Consolidated Complaint, in its entirety. Judge Locke made several credibility determinations throughout his 63-page opinion.
- 3. On December 16, 2013, the Region filed 71 Exceptions to Judge Locke's Decision.
 - 4. UPS has been, and is in the process of, analyzing the Region's Exceptions.
- 5. Due to the number of Exceptions filed by Region along with the extensive amount of evidence submitted by the parties during the hearing and relied upon by Judge Locke in his Decision, UPS will need additional time to prepare a response to the Region's Exceptions and prepare a Supporting Memorandum of Law that addresses all of the legal claims and arguments raised by the Region in its 82-page Brief.
 - 6. UPS' response to the Region's Exceptions is currently due March 31, 2014.
- 7. UPS submits that the current request is for good cause and will not prejudice any party.
- 8. This will be UPS' second request for an extension to submit a response to Exceptions, and it does not anticipate the need for any further extensions. Counsel for UPS has conferred with Counsel for the General Counsel who has indicated that the Region will not take a position on this Motion.

s/ Aron Z. Karabel

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Attorneys for United Parcel Service, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic and U.S. Mail upon:

Martha Kinard, Regional Director National Labor Relations Board Region 16 Room 8A24, Federal Office Bldg. 819 Taylor Street Fort Worth, TX 76102

Reggie Thomas, Steward Teamsters Local 373 2305 Pecan Street Texarkana, AR 71854-3656

on March 24, 2014.

s/ Aron Z. Karabel	
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